

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

AMERICAN PATENTS LLC,

Plaintiff,

v.

SEIKO EPSON CORPORATION and
EPSON PRECISION PHILIPPINES, INC.,

Defendants.

CIVIL ACTION NO. 4:21-cv-718-ALM

JURY TRIAL DEMANDED

JOINT MOTION TO STAY ALL DEADLINES IN VIEW OF SETTLEMENT

Defendants Seiko Epson Corporation (“Seiko Japan”) and Epson Precision Philippines, Inc. (“Epson Philippines”) (Seiko Japan and Epson Philippines are referred to collectively as “the Epson Defendants”) and Plaintiff American Patents LLC (“American”) hereby submit this Joint Motion To Stay All Deadlines in View of Settlement and respectfully show the Court as follows:

- (1) As American and the Epson Defendants previously notified the Court on March 25, 2022 (D.I. 35), the parties have reached a settlement in principle resolving all matters in controversy between American and the Epson Defendants in the above-referenced action and are in the process of finalizing the settlement.
- (2) On March 25, 2022 the parties requested (D.I. 35), and on March 29, 2022 the Court entered (D.I. 36), a forty-five (45) day stay of all unreached deadlines to allow the parties to finalize the agreement.

(3) The parties have made progress, are in the process of obtaining signatures for the agreement, and need additional time to finalize the agreement and file dismissal papers.

(4) Accordingly, American and the Epson Defendants submit that the Court's resources would best be served by a further stay of all unreached deadlines for a period of fifteen (15) days so that the announced settlement in principle may be completed and appropriate dismissal papers thereafter filed with the Court.

WHEREFORE, American and the Epson Defendants request the Court grant this Joint Motion To Stay All Deadlines and Notice of Settlement and enter an Order granting a temporary stay of all upcoming deadlines for a period of fifteen (15) days.

Dated: May 26, 2022

Respectfully submitted,
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on May 26, 2022.

/s/Zachariah S. Harrington
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